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May 7, 2025

Magistrate Judge Peggy Kuo
U.S. Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

RE: Edwards v. Stern & Stern, PC
       24-cv-08137

Dear Judge Kuo:

As you know, the undersigned represents the defendant in the above captioned matter. Our office took over this matter from defendant's previous counsel, Clark Hill PLC, on March 7, 2025.

This letter is written on behalf of both parties to this litigation to inform the Court of the status of this case. There has been some delay in proceeding but there has been progress on discovery, as well.

With respect to progress, defendant has answered plaintiff's discovery demands and the 30(b)(6) deposition of defendant has also been completed. There are some document demands connected with defendant's deposition that are still outstanding. It is defendant's intention to depose the plaintiff, but plaintiff's deposition has not been scheduled.

With respect to the delays that have been present in this case, the Court should be aware that defendant's insurance carrier had declined coverage at the time that this office was retained to represent the defendant. Subsequently, defendant's insurance carrier reconsidered its previous position and agreed to provide coverage to the defendant. Our office notified plaintiff's counsel of this development last month. The insurance carrier needed to decide whether this office would remain as counsel for the defendant and, until yesterday, defendant was not informed of the decision by the carrier with respect to representation. I am pleased to inform the Court that insurance carrier has now decided to keep this office as counsel for the defendant. As a result, we are now authorized to continue our representation and participate in the discovery process.

Our office will continue to work, in a collaborative manner, with plaintiff's counsel in proceeding with all outstanding discovery.

Sincerely,

BARRON & NEWBURGER, P.C.

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By: Arthur Sanders
as/bmm

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